

UPS

Mr. David Keith  
Project Coordinator  
Anchor QEA, LLC  
614 Magnolia Avenue  
Ocean Springs, MS 39654

RE: Additional South Impoundment Sampling  
San Jacinto River Waste Pits Superfund Site, Pasadena, Harris County, Texas  
Unilateral Administrative Order, CERCLA Docket No. 06-03-10

Dear Mr. Keith:

The U.S. Environmental Protection Agency (EPA) has reviewed the validated sampling data collected for the *Sampling and Analysis Plan: Soil Study, Addendum 1* (March 2011) and have the following comments:

1. Seventeen additional soil cores shall be collected at the locations identified on the enclosed maps. These additional soil cores shall be collected following the field sampling procedures detailed in the *Final Sampling and Analysis Plan: Soil Study, Addendum 1* with these modifications:
  - All soil cores shall be analyzed for all chemicals listed on Table 14 Final Chemicals of Potential Concern from the *Final COPC Technical Memorandum* (May 2011) and including: total organic carbon and grain size.
  - The first interval of each core will be separated into three surface intervals: 0 to 6 inches, 6 to 12 inches (0 to 15 and 15 to 30 cm), and 12 to 24 inches (30 to 60 cm). Subsequent intervals shall be at every 2'.
  - All soil cores shall be collected to a minimum of 5' into native materials with the deepest increment represented by a composite sample across the deepest 5' of the core, collected entirely within native materials as indicated by grain size and other characteristics observable in the field, and which indicate an absence of human disturbance.
2. Three additional sediment samples shall be collected at the locations identified on the enclosed maps. These additional sediment samples shall be collected following the field sampling procedures detailed in the *Final Sampling and Analysis Plan: Sediment Study* (April 2010) with these modifications:
  - All sediment samples shall be analyzed for all chemicals listed on Table 14 Final Chemicals of Potential Concern from the *Final COPC Technical Memorandum* (May 2011) and including: total organic carbon and grain size.

- All sediment samples shall be collected at three surface intervals: 0 to 6 inches, 6 to 12 inches (0 to 15 and 15 to 30 cm), and 12 to 24 inches (30 to 60 cm).
3. Three additional monitoring wells or piezometers shall be installed at the locations identified on the enclosed maps and ground water samples collected. These additional monitoring wells or piezometers and ground water samples shall be collected following the field installation and sampling procedures detailed in the *Final Groundwater Study: Sampling and Analysis Plan* (January 2011) with these modifications:
- All ground water samples shall be analyzed for all chemicals listed on Table 14 Final Chemicals of Potential Concern from the *Final COPC Technical Memorandum* (May 2011) and including: total dissolved solids.
  - Screens depths shall be completed within the uppermost water bearing zone.

Please proceed with the submittal of the sampling and analysis plan (or addendums) for this additional south impoundment sampling. Please contact me at (214) 665-8318, or by email at [miller.garyg@epa.gov](mailto:miller.garyg@epa.gov) if there are any questions or comments.

Sincerely,

Gary Miller, P.E.  
Remedial Project Manager

Enclosures (2)

cc: Ludmila Voskov, TCEQ  
Jessica White, NOAA  
Bob Allen, Harris County  
Nicole Hausler, Port of Houston